

2016R00258/LMC/SF

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 22-
	:	
	:	18 U.S.C. § 1958
BOMANI AFRICA, a/k/a "Baxter Keys"	:	

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

A. Defendant BOMANI AFRICA, a/k/a "Baxter Keys," was a resident of Philadelphia, Pennsylvania.

B. There was a coconspirator ("CC-1"), who was a resident of Connecticut, and AFRICA's associate.

C. There was a coconspirator ("CC-2"), who was a New Jersey resident.

D. The Victim was a resident of Jersey City, New Jersey.

THE MURDER FOR HIRE CONSPIRACY

2. From in or about April 2014 through on or about May 23, 2014, in Hudson County, in the District of New Jersey and elsewhere, defendant

**BOMANI AFRICA
a/k/a "Baxter Keys"**

knowingly and intentionally conspired and agreed with CC-1 and CC-2 to travel in, and cause another to travel in, interstate commerce, that is, from Connecticut and Pennsylvania to New Jersey, and to use, and cause another to use, facilities of interstate commerce, with intent that a murder be committed, in violation of the laws of the State of New Jersey, specifically, N.J.S.A. § 2C:11-3, as consideration for the receipt of and as consideration for a promise and agreement to pay a thing of pecuniary value, that is, United States currency, resulting in the death of the Victim.

Object of the Conspiracy

3. The object of the conspiracy was for CC-2 to pay AFRICA and CC-1 thousands of dollars in cash in consideration for murdering the Victim.

Manner and Means

4. The manner and means by which AFRICA, CC-1, and CC-2 sought to accomplish the object of the conspiracy included, among other things, the following:

a. In or about April 2014, while in New Jersey, CC-2 solicited CC-1 to commit a murder in exchange for cash.

b. CC-1 recruited AFRICA to commit the murder-for-hire following an interstate telephone call and in-person meeting between them.

c. CC-1 informed CC-2 that CC-1 and AFRICA were willing to commit the murder-for-hire. CC-2 advised CC-1 that the Victim was the target and paid CC-1 several thousand dollars in cash up front.

d. On or about May 22, 2014, AFRICA and CC-1 traveled from Pennsylvania and Connecticut, respectively, to New Jersey for the purpose of murdering the Victim.

e. On or about May 22, 2014, AFRICA and CC-1 went to the Victim's apartment in Jersey City. After entering the apartment, AFRICA and CC-1 stabbed the Victim to death. AFRICA and CC-1 then set fire to the Victim's apartment.

f. On or about May 23, 2014, in Elizabeth, New Jersey, CC-2 met with CC-1 and paid CC-1 several thousand dollars in cash as consideration for the murder of the Victim. CC-1 shared that money with AFRICA.

In violation of Title 18, United States Code, Section 1958.

FORFEITURE ALLEGATION

1. The allegations in this Information are realleged here for the purpose of alleging forfeiture.

2. As a result of committing the offense charged in this Information, defendant

**BOMANI AFRICA
a/k/a “Baxter Keys”**

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting and derived from any proceeds traceable to the said offense.

Substitute Assets Provision

3. If any of the property described above, as a result of any act or omission of AFRICA:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 18 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of AFRICA up to the value of the above forfeitable property.

A handwritten signature in blue ink that reads "Philip R. Sellinger". The signature is written in a cursive, slightly slanted style.

PHILIP R. SELLINGER
UNITED STATES ATTORNEY

CASE NUMBER: 22-

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**BOMANI AFRICA
a/k/a “Baxter Keys”**

INFORMATION FOR

18 U.S.C. § 1958

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